RIDER TO CITATION TO DISCOVER ASSETS

YOU ARE COMMANDED to produce at the examination copies of the following documents. Unless otherwise noted, all requests shall include the time periods noted in each such requests.

- Any and all documents that refer to, relate to, or reflect any and all current bank
 accounts (including but not limited to checking, savings, money market accounts,
 trust accounts) in the name of Richmond Chemical Corporation ("Richmond"),
 that reflect the account number as well as the address of the branch used and
 are located within the United States, and in other countries throughout the
 world.
- 2. Any and all documents that refer to, relate to, or reflect any and all current bank accounts (including but not limited to checking, savings, money market accounts, trust accounts) located in the U.S. and in other countries throughout the world, which are NOT in the name of Richmond and which are used to receive monies for Richmond, or to pay monies on behalf of Richmond.
- 3. Any and all documents that constitute, refer to, or relate to any real property currently owned by Richmond, in any capacity, and irrespective of the location of such property, whether it is in the United States or elsewhere throughout the world, and to include documents reflecting mortgages, liens or charges against such properties, and also including the most recent appraisals or assessments in regard to each property.
- 4. Any and all documents that constitute, refer to or relate to all physical assets currently owned by Richmond, each of which has a value in excess of \$1,000, and

to include such property as Atomic Force, Microscopy Systems, Inverted Microscopes, Total Internal Reflection Florescence Systems (TRIF Systems) and all laboratory-related equipment, machinery, devices and apparatus used by Richmond in any and all manufacturing, distribution, research, device development, screening and any and all other technologies developed and/or used for any and all purposes by Richmond. Such documents shall also include the physical location of each of such assets as well as the value of assets, as well as its serial number, manufacturer and model.

- 5. Any and all documents that constitutes, refer to or relate to any loan or credit applications made by Richmond or any entity in which Richmond has an interest, including all net worth, financial or other statements, schedules or attachments, that reflect an application for funds submitted by Richmond to any lender or funding source, from January 1, 2011 to the present date.
- 6. Any and all documents that constitute, refer to, or relate to all stocks, membership interests, partnership interests, bonds, mutual funds or options currently owned by Richmond in regard to public or private corporations, subsidiaries, affiliates or other business entities.
- 7. Any and all documents that constitute, refer to, or relate to any and all loans currently outstanding to Richmond shareholders, directors or officers.
- 8. Any and all documents that constitute, refer to, or relate to all current or ongoing contracts with customers whereby Richmond is providing services in

- regard to research, implementation of proprietary technologies and for any and all other purposes.
- 9. Any and all documents that constitute, refer to, or relate to all current licensing agreements whereby Richmond is either the licensor or the licensee.
- 10. Any and all documents that constitute, refer to, or relate to contracts for commercial production with manufacturing partners whether located in the United States, the U.K., India, Korea, China or elsewhere in the world.
- 11. Names and addresses of all current stockholders, directors, and officers of Richmond including the number of shares held by each person and the percentage of each person's ownership in Richmond.
- 12. Any and all documents that constitute, refer to, or relate to accounts receivable on Richmond's books, including the name of each company or entity which owes money to Richmond including its address, amount currently due and any payment plans currently in effect.
- 13. Any and all documents that refer or relate to any liens, or a security interest currently held by any entity in any physical assets of Richmond, including the name of the asset, the name and address of the lien holder, and the amount due on any such lien or charge.
- 14. Any and all documents that constitute, refer to, or relate to or reflect ownership of any and all motor vehicles or other motorized vehicles currently owned by Richmond.

- 15. Richmond's federal and state income tax returns including all schedules for the years 2010, 2011, and 2012.
- 16. Any and all documents that constitute, refer to, or relate to the sale of any of Richmond's assets to any person, party or entity within the past 12 months.
- 17. Any and all documents that constitute, refer to, or relate to judgments outstanding against Richmond, including the caption of the case, the creditor's name, amount due and the name of the court and the docket number.
- 18. Any and all documents that constitute, refer to, or relate to any and all litigation Richmond is presently involved in any respect, including the nature of the litigation, the caption of the case, including the name of the court, and the case number.
- 19. Any and all documents that constitute, refer to, or relate to or reflect all salaries, bonuses, and other compensation paid from January 1, 2011 to the present time to Richmond stockholders, directors and officers.
- 20. Any and all documents that constitute, refer to, or relate to intellectual property held by Richmond including but not limited to patents and trademarks.
- 21. Any and all documents that constitute, refer to, or relate to bioprocess and/or other development agreements between Richmond or its wholly-owned subsidiaries and third parties.